

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

MONARCH NETWORKING
SOLUTIONS LLC,

Plaintiff,

v.

CISCO SYSTEMS, INC.

Defendant.

Civil Action No. 2:20-CV-00015-JRG

JURY TRIAL DEMANDED

**DECLARATION OF MICHAEL R. RHODES IN SUPPORT OF DEFENDANT
CISCO SYSTEMS, INC.'S MOTION TO TRANSFER VENUE
TO THE NORTHERN DISTRICT OF CALIFORNIA**

I, Michael R. Rhodes, declare:

1. I am an attorney at the law firm Desmarais LLP, counsel for Defendant Cisco Systems, Inc. (“Cisco”) in the above captioned matter. I am admitted *pro hac vice* to this Court. I submit this declaration based on personal knowledge, and if called upon as a witness, I could competently testify to the truth of each statement herein.

2. I make this declaration in support of Defendant Cisco Systems, Inc.’s Motion To Transfer Venue To The Northern District Of California, submitted concurrently.

3. Attached as Exhibit 1 is a true and accurate copy of the August 20, 2020 declaration of Soumitra Mukherji.

4. Attached as Exhibit 2 is a true and accurate copy of the August 21, 2020 declaration of Mitch Oliver.

5. Attached as Exhibit 3 is a true and accurate copy of the August 27, 2020 declaration of Jeff Lund.

6. Attached as Exhibit 4 is a true and accurate copy of the August 29, 2020 declaration of Ghulam Awan.

7. Attached as Exhibit 5 is a true and accurate copy of the August 31, 2020 declaration of Shankarnarayan Dharmarajan.

8. Attached as Exhibit 6 is a true and accurate copy of U.S. Patent No. 8,130,775, with annotations added for clarity.

9. Attached as Exhibit 7 is a true and accurate copy of Defendant Cisco Systems, Inc.’s June 8, 2020 Initial And Additional Disclosures, with annotations added for clarity.

10. Attached as Exhibit 8 is a true and accurate copy of Plaintiff Monarch Networking Solutions, LLC's June 8, 2020 Initial And Additional Disclosures, with annotations added for clarity.

11. Attached as Exhibit 9 is a true and accurate copy of Plaintiff Monarch Networking Solutions, LLC's June 24, 2020 Amended Initial And Additional Disclosures, with annotations added for clarity.

12. Attached as Exhibit 10 is a true and accurate copy of excerpts of Defendant Cisco Systems, Inc.'s June 29, 2020 Preliminary Invalidity Contentions, with annotations added for clarity.

13. Attached as Exhibit 11 is a true and accurate copy of *Godo Kaisha IP Bridge 1 v. Intel Corp.*, Case No. 2:17-cv-00676-RWS (E.D. Tex. Sept. 28, 2018), ECF No. 157.

14. Attached as Exhibit 12 is a true and accurate copy of excerpts from a presentation titled "Patent Portfolio Overview," bearing Bates numbers MON-CISCO-0001915 and MON-CISCO-00001920, with annotations added for clarity (filed under seal).

15. Attached as Exhibit 13 is a true and accurate copy of the Bloomberg company profile "Acacia Research Group LLC", accessed and printed from <https://www.bloomberg.com/profile/company/3148094Z:US> (last accessed September 2, 2020), with annotations added for clarity.

16. Attached as Exhibit 14 is a true and accurate copy of the Corporation Wiki company profile "Monarch Networking Solutions LLC", accessed and printed from <https://www.corporationwiki.com/p/35hv70/monarch-networking-solutions-llc> (last accessed September 2, 2020), with annotations added for clarity.

17. Attached as Exhibit 15 is a true and accurate copy of the Internet Engineering Task Force (“IETF”) “Legal Request Procedures), accessed and printed from <https://www.ietf.org/about/administration/legal-request-procedures/> (last accessed September 2, 2020), with annotations added for clarity.

18. Attached as Exhibit 16 is a true and accurate copy of the IETF “About”, accessed and printed from <https://www.ietf.org/about/> (last accessed September 2, 2020), with annotations added for clarity.

19. Attached as Exhibit 17 is a true and accurate copy of the Bloomberg company profile [REDACTED] accessed and printed from [REDACTED] (last accessed September 2, 2020), with annotations added for clarity.

20. Attached as Exhibit 18 is a true and accurate copy of the [REDACTED] “Legal Process Guidelines”, accessed and printed from [REDACTED] (last accessed September 2, 2020), with annotations added for clarity.

21. Attached as Exhibit 19 is a true and accurate copy of the LinkedIn profile of Arnaud Cauvin, with annotations added for clarity.

22. Attached as Exhibit 20 is a true and accurate copy of the LinkedIn profile of Charlie Raasch, with annotations added for clarity.

23. Attached as Exhibit 21 is a true and accurate copy of the LinkedIn profile of Dave Brush, with annotations added for clarity.

24. Attached as Exhibit 22 is a true and accurate copy of the LinkedIn profile of Dave Ward, with annotations added for clarity.

25. Attached as Exhibit 23 is a true and accurate copy of the LinkedIn profile of Eric Lucas, with annotations added for clarity.

26. Attached as Exhibit 24 is a true and accurate copy of the LinkedIn profile of Erik Ahroon, with annotations added for clarity.

27. Attached as Exhibit 25 is a true and accurate copy of the LinkedIn profile of Frederic Jounay, with annotations added for clarity.

28. Attached as Exhibit 26 is a true and accurate copy of the LinkedIn profile of Jean-Luc Grumault, with annotations added for clarity.

29. Attached as Exhibit 27 is a true and accurate copy of the LinkedIn profile of Keyur Patel, with annotations added for clarity.

30. Attached as Exhibit 28 is a true and accurate copy of the LinkedIn profile of Marc Booth, with annotations added for clarity.

31. Attached as Exhibit 29 is a true and accurate copy of the LinkedIn profile of Mark Townsley, with annotations added for clarity.

32. Attached as Exhibit 30 is a true and accurate copy of the LinkedIn profile of Michael J. Kim, with annotations added for clarity.

33. Attached as Exhibit 31 is a true and accurate copy of the LinkedIn profile of Mitch Oliver, with annotations added for clarity.

34. Attached as Exhibit 32 is a true and accurate copy of the LinkedIn profile of Mohammed Kassi Lahlou, with annotations added for clarity.

35. Attached as Exhibit 33 is a true and accurate copy of the LinkedIn profile of Nadereh Russell, with annotations added for clarity.

36. Attached as Exhibit 34 is a true and accurate copy of the LinkedIn profile of Ole Trøan, with annotations added for clarity.

37. Attached as Exhibit 35 is a true and accurate copy of the LinkedIn profile of Rahul Aggarwal, with annotations added for clarity.

38. Attached as Exhibit 36 is a true and accurate copy of the LinkedIn profile of Rob Hamilton, with annotations added for clarity.

39. Attached as Exhibit 37 is a true and accurate copy of the LinkedIn profile of Soumitra Mukherji, with annotations added for clarity.

40. Attached as Exhibit 38 is a true and accurate copy of the LinkedIn profile of Vishnuprakash Selvarajan, with annotations added for clarity.

41. Attached as Exhibit 39 is a true and accurate copy of U.S. Patent No. 8,451,844.

42. Attached as Exhibit 40 is a true and accurate copy of U.S. Patent No. 8,451,845.

43. Attached as Exhibit 41 is a true and accurate copy of U.S. Patent No. 9,019,965.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on the 3rd day of September, 2020 in San Francisco, CA.

/s/ Michael R. Rhodes